एनटीपीसी NTPC
A Maharatna Company

एन टी पी सी लिमिटेड
(भारत सरकार का उद्यम)
NTPC Limited
(A Govt. of India Enterprise)

केन्द्रीय कार्यालय / Corporate Centre

Date: 31.08.2026

The Secretary
Central Electricity Regulatory Commission,
6th, 7th & 8th Floor, Tower B,
World Trade Centre,
Nauroji Nagar,
New Delhi-110029

Subject: NTPC Submission of Comments on Draft (Sharing of Inter-state Transmission Charges and Losses) (Fifth Amendment) Regulations, 2026.

Sir,

Hon'ble Commission has published Draft (Sharing of Inter-State Transmission Charges and Losses) (Fifth Amendment) Regulations, 2026 and has invited comments from various stakeholders on the draft Amendment.

In this regard, please find enclosed submissions of NTPC.

Thanking you,

Yours sincerely

Ajay Dua
ED (Commercial)

अभियांत्रिकी कार्यालय परिसर, प्लाट नं. ए–8ए, सैक्टर–24, पोस्ट बाक्स नं. 13, नोएडा–201301 (उ.प्र.)
ENGINEERING OFFICE COMPLEX, Plot No. A-8A, Sector-24, Post Box No. 13, NOIDA-201301 (U.P.)
दूरभाष / Tel.: 0120-4948000, 0120-2410333, 0120-2410801 फैक्स / Fax : 0120-2410136, 0120-2410137
पंजीकृत कार्यालयः एन.टी.पी.सी भवन, स्कोप काम्पलैक्स, 7, इंस्टीटयूशनल एरिया, लोधी रोड़, नई दिल्ली–110003
Regd. Office : NTPC Bhawan, Scope Complex, 7, Institutional Area, Lodhi Road, New Delhi-110003
दूरभाष/Tel.: 011-24387333 फैक्स/Fax : 011-24361018 • CIN : L40101DL1975GO1007966 • E-mail : ntpccc@ntpc.co.in

NTPC Submission on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (Fifth Amendment) Regulations, 2026.

I. Sl.no 4(5) The draft Regulation proposes that New sub-clauses (h-i) shall be inserted after sub-clause (h) of Clause (2) of Regulation 13 of the Principal Regulations as under:

(h-i) Any REGS based on wind or solar source or RHGS based on combination of wind and solar source, which has entered into a contract for a minimum tenure of seven (07) years with a buyer (either directly or through a trading licensee or Renewable Energy Implementing Agency) on or before 31.12.2026 and is delayed beyond its firm start date of connectivity (granted by CTUIL in terms of the GNA Regulations) ***on account of non-availability of transmission system****, and the project achieves COD within a period of two months from the date of effectiveness of its GNA as per GNA Regulations, it shall be eligible for a waiver of inter-state transmission charges considering the slab of waiver as per its firm start date of connectivity in terms of the Table 6:*

Table 6

Particulars of the Project	Firm start date of Connectivity	Waiver period from the COD	% of drawal schedule to be considered under Annexure-III
REGS based on wind or solar source or RHGS based on combination of wind and solar source	On or before 30.06.2025	Up to the tenure of the Contract	100
	1.7.2025 to 30.6.2026		75
	1.7.2026 to 30.6.2027		50
	1.7.2027 to 30.6.2028		25
	After 30.06.2028		0

Submission:

The MoP order 23.11.2021, in accordance with Tariff policy, 2016 was notified to encourage faster capacity additions of Solar and Wind sources by providing ISTS charge waiver to eligible renewable energy projects, irrespective of their commercial power sale arrangement. Projects developed under long-term procurement through competitive bidding, bilateral arrangements, as well as merchant mode, were all made eligible for the ISTS waiver.

However, the proposed introduction of a requirement for a minimum contract tenure of seven years for availing the extended ISTS waiver protection results in differential treatment among projects based solely on their commercial power sale arrangement.

Merchant projects and projects backed by PPAs of 7 years or more follow the same connectivity process and are equally susceptible to delays arising from non-availability of the transmission system. The impact of such delays is independent of the tenure or nature of the commercial power sale arrangement.

Therefore, restricting the proposed ISTS waiver protection only to projects having a minimum seven-year contract tenure may result in differential treatment among projects facing the same transmission-related constraint.

Accordingly, It is submitted that the clause be modified as below.

(h-i) Any REGS based on wind or solar source or RHGS based on combination of wind and solar source, ~~which has entered into a contract for a minimum tenure of seven (07) years with a buyer (either directly or through a trading licensee or Renewable Energy Implementing Agency) on or before 31.12.2026 and~~ is delayed beyond its firm start date of connectivity (granted by CTUIL in terms of the GNA Regulations) on account of non-availability of transmission system, and the project achieves COD within a period of two months from the date of effectiveness of its GNA as per GNA Regulations, it shall be eligible for a waiver of inter-state transmission charges considering the slab of waiver as per its firm start date of connectivity in terms of the Table 6